

June 1, 2021

VIA ECF

Hon. Diane Gujarati **United States District Court** Eastern District of New York 225 Cadman Plaza East, Courtroom 4B South Brooklyn, New York 11201

> Re: AA Medical, P.C. v. Almansoori

Case No. 20-cv-03852 (DG)(JMW)

Dear Judge Gujarati:

I am counsel for the Plaintiff in the above-referenced matter. I write with the knowledge and consent of Adam I. Kleinberg, Esq, counsel for the Defendant, to respectfully request an extension of time for the Plaintiff's filing of the consolidated, amended complaint in this matter.

Following the May 7, 2021 teleconference, the Court directed the Plaintiff to file its consolidated, amended complaint by June 4, 2021 and the Defendant was directed to answer or otherwise respond to the operative complaint by June 25, 2021. I respectfully request until June 14, 2021 to file the consolidated, amended complaint and the Defendant, in offering his consent, has requested until July 12, 2021 to respond.

This is the first such extension request. The reason for the request is that I have been inundated with deadlines, including an extensive pre-trial order before Judge Gary R. Brown, also due June 4, 2021, and the schedules of Plaintiff's principal, a practicing doctor, and I have made meeting to discuss the amended complaint difficult. I am confident that the requested ten (10) day extension, if granted, will be sufficient time to complete and file the consolidated amended complaint.

I thank the Court for its time and consideration in this regard.

Respectfully submitted,

LAW OFFICES OF DAVID A. ANTWORK, P.C.

David A. Antwork

DAVID A. ANTWORK (DA1168)

Adam I. Kleinberg, Esq. (via ECF) cc:







